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(Endorsement Required)

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Kingston Steel Drum/Great Lakes Container Corp.
c/o Patricia H. Duft, Staff Vice President
Legal & Regulatory Services
Mallinckrodt Inc.
675 McDonnell Boulevard
St. Louis, MO 63042

PS Form 3800, January 2001

See Reverse for Instructions

Certified Mail Provides:

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- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

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- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
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SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Kingston Steel Drum/Great Lakes Container Corp.
c/o Patricia H. Duft, Staff Vice President
Legal & Regulatory Services
Mallinckrodt Inc.
675 McDonnell Boulevard
St. Louis, MO 63042

COMPLETE THIS SECTION ON DELIVERY

- | | |
|---|--|
| A. Received by (Please Print Clearly) <i>J. Rachel</i> | B. Date of Delivery <i>8/22/05</i> |
| C. Signature <i>J. Rachel</i> | <input type="checkbox"/> Agent <input type="checkbox"/> Addressee |
| D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No | |

4. Restricted Delivery? (Extra Fee) ☐ Yes

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Martha Bosworth, Enforcement Coordinator
U.S. Environmental Protection Agency
New England
1 Congress Street, Suite 1100 (HBS)
Boston MA 02203-0235

0030-0235

HBS

114+2010





Superfund Record
Wells G & H
11.9
283 405

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA NEW ENGLAND
1 CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023**

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

August 16, 2005

Kingston Steel Drum/Great Lakes Container Corp.
c/o Patricia H. Duft, Staff Vice President
Legal & Regulatory Services
Mallinckrodt Inc.
675 McDonnell Boulevard
St. Louis, MO 63042

Re: Supplemental Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, Massachusetts, hereinafter referred to as the "Site"

Dear Ms. Duft:

The United States Environmental Protection Agency (EPA) is investigating the source, extent and nature of the release or threatened release of any hazardous substance, pollutant or contaminant, or hazardous waste at the Whitney Barrel Company, 256 Salem Street, Woburn, Massachusetts, situated within the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to the Site and/or generated, treated, stored, or disposed of at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Site.

Specifically, EPA is seeking additional details regarding some of the information you provided in your, March 31, 2004, response to EPA's Section 104(e) Request For Information dated December 15, 2003. This letter requests your cooperation in providing information and documents to EPA clarifying your relationship to the Whitney Barrel Company and thereby your relationship to the Site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this

Information Request **within thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to thirty-two thousand five hundred dollars (\$32,500) for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also, be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq. Your response to this Information Request should be mailed to:

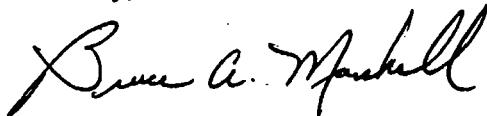
U.S. Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114

ATTN: Wells G&H Case Team

If you have questions concerning the this Information Request, you may contact Martha Bosworth, Enforcement Coordinator at 617-918-1407. Technical questions concerning the Site should be referred to Joseph LeMay, the Remedial Project Manager at 617-918-1323. If you have legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Susan Scott, Enforcement Counsel at (617) 918-1778.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Marshall". The signature is fluid and cursive, with the first name "Bruce" and last name "Marshall" clearly distinguishable.

Bruce A. Marshall, Chief
Search and Cost Recovery Section, Technical & Support Branch
Office of Site Remediation and Restoration
Enclosures

0030-0237

**WELLS G & H SUPERFUND SITE
SUPPLEMENTAL 104(E) QUESTIONS FOR
MALLINCKRODT, INC.**

Period Being Investigated: 1973 to 1980

Note: All questions refer to the period being investigated unless otherwise indicated.

Information Request Definitions

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear herein:

1. The terms "you," "your," "Kingston Steel Drum," "Great Lakes Container," "Mallinckrodt," and "Respondent" shall mean Mallinckrodt, Inc., its officers, managers, employees, contractors, trustees, successors, and agents, and any predecessor, parent or successor corporations or companies.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
 - a. Writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
 - i. invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order;
 - ii. letter, correspondence, fax, telegram, telex;
 - iii. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
 - iv. agreement, contract, and the like;
 - v. log book, diary, calendar, desk pad, journal;
 - vi. bulletin, circular, form, pamphlet, statement;
 - vii. report, notice, analysis, notebook;
 - viii. graph or chart; or
 - ix. copy of any document.
 - b. Microfilm or other film record, photograph, or sound recording on any type of device;
 - c. Any tape, disc, or other type of memory generally associated with computers and data processing, together with:
 - i. the programming instructions and other written material necessary to use

- ii. such punch card, disc, or disc pack, tape or other type of memory; and printouts of such punch card, disc, or disc pack, tape or other type of memory; and
 - d. Attachments to or enclosures with any document as well as any document referred to in any other document.
- 3. The term “identify” means, with respect to a natural person, to set forth:
 - a. The person’s full name;
 - b. Present or last known business and home addresses and telephone numbers;
 - c. Present or last known employer (include full name and address) with job title, position or business; and
 - d. The person’s social security number.
- 4. The term “identify” means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth:
 - a. Its full name;
 - b. Complete street address;
 - c. Legal form (e.g., corporation, partnership, etc.);
 - d. The state under whose laws the entity was organized; and
 - e. A brief description of its business.
- 5. The term “identify” means, with respect to a document, to provide:
 - a. Its customary business description (e.g., letter, invoice);
 - b. Its date;
 - c. Its number if any (e.g., invoice or purchase order number);
 - d. The identity of the author, addressor, addressee and/or recipient; and
 - e. A summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.
- 6. The terms “the period being investigated” and “the relevant time period” shall mean the period being investigated as specified on the first page of the Information Request Questions.
- 7. The term “the Site” shall mean and include the property on or about the 330 acres of land in Woburn, Massachusetts currently identified by the U.S. EPA as the Wells G & H Superfund Site.
- 8. The term “material” or “materials” shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

9. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
10. The term “container” shall mean any metal or plastic vessel, including but not limited to, drums, barrels, tins, and tanks.
11. The term “Whitney Barrel” shall mean Whitney Barrel Co., Inc., its officers, managers, employees, trustees, successors, and agents, and any predecessor, parent, or successor corporations or companies.
12. The term “104(e) response” shall mean Mallinckrodt’s response dated March 31, 2004 to the CERCLA 104(e) Information Requests dated December 15, 2003 which were directed to Great Lakes Container Corporation and Kingston Steel Drum.

INFORMATION REQUEST QUESTIONS

Information Concerning the Sale of the Great Lakes Container Division

1. In your 104(e) response, you stated that Kingston Steel Drum became a division of Great Lakes Container and that the Great Lakes Container Division was sold to The 3016 Corporation in 1976. Please describe the environmental liabilities for Kingston Steel Drum (Great Lakes Container Division) that Mallinckrodt retained and those that The 3016 Corporation assumed pursuant to this transaction. Please provide any documentation, contracts, and/or agreements related to this transaction.
2. Please describe the current relationship, if any, between Mallinckrodt and Great Lakes Container.
3. In your 104(e) response, you stated that the Kingston Steel Drum facility ceased operations in 1976 when the facility was sold to The 3016 Corporation but you provided evidence of drums and other wastes being picked up from the facility through 1980. Please describe the nature of the operations conducted at the Kingston Steel Drum facility from 1976 through 1980.

Information Concerning Respondent’s Association with Whitney Barrel

1. For each shipment of used containers to Whitney Barrel, please provide:
 - a. The dates of each pickup and delivery;
 - b. The number of containers;
 - c. The type(s) of containers;
 - d. The condition of each container;

- e. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g., solid, sludge, liquid);
 - iv. the volume of each material;
 - f. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
 - g. A description of how Respondent disposed of any emptied materials and/or rinse water;
 - h. The name(s) and street address(es) of each customer whose drums were sent/delivered to Whitney Barrel during the 1973 through 1980 time period; and
 - i. Any documentation or additional information regarding these transactions.
2. Describe the circumstances under which you would send/deliver drums to Whitney Barrel rather than process them in your own facility (i.e., unable to process volume of inventory at facility, unable to process type of drums, etc.).

Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies

1. State whether Respondent sent, received, or traded containers with any other drum reconditioning/recycling company during the period being investigated, including but not limited to Edward C. Whitney & Son, Inc. (also known as E. C. Whitney), Kingsland Drum Company, Roche Brothers Barrel & Drum Co., Roy Brothers, Inc., Ryan Barrel Company, and Woburn Barrel.
2. For each of the above companies, please identify:
 - a. How frequently each company sent, received, or traded containers with the Respondent;
 - b. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g., solid, sludge, liquid);
 - iv. the volume of each material;
 - c. The volume (i.e., number of containers, size of each container, and volume of waste associated with each container) of containers sent, received, or traded with the Respondent;
 - d. The time period during which containers were sent, received, or traded with the Respondent;

- e. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- f. A description of how Respondent disposed of any emptied materials and/or rinse water;
- g. The circumstances under which you would send/deliver drums to the company rather than process them in your own facility (i.e., unable to process the volume of inventory at the facility, unable to process the type of drums, etc.); and
- h. Provide any documentation or additional information related to these transactions.

Compliance with this Request

Note: All questions in this section refer to the present time unless otherwise indicated.

- 1. Describe all sources reviewed or consulted in responding to this request and all individuals who have any knowledge of, or information about, the subject matter of any of the foregoing questions, including but not limited to:
 - a. The name of each individual;
 - b. The current job title and job description of each individual;
 - c. The job title and job description during the period being investigated of each individual;
 - d. Whether each individual is a current or past employee of Respondent;
 - e. A description of the types of information the individual possesses (i.e., specific information on company operations, wastes generated, and/or waste disposal practices);
 - f. The names of all divisions or offices of Respondent for which records were reviewed;
 - g. The nature of all documents reviewed;
 - h. The locations where those documents reviewed were kept prior to review; and
 - i. The location where those documents reviewed are currently kept.